

Exhibit 13

Michigan Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

Search Terms: On December 7, 2024, Meta made its most recent counterproposal to the Michigan (i) Department of Education, (ii) Department of Health and Human Services, (iii) State Budget Office, (iv) Executive Office of the Governor, and (v) the Department of Lifelong Education, Advancement, and Potential.

At a high level, Meta’s proposal involves using search combinations that require either “Social Media Terms” or substantive “Harm Terms” to occur in the same document or “within 150” of one of the following “Youth Terms,” depending on the specific agency:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen z” OR “generation z” OR generation-z OR genz OR generationz OR “gen-z” OR “gen alpha” OR “generation alpha” OR gen-alpha OR generation-alpha OR genalpha OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Department of Education

#	Social Media Terms
1	“Youth Terms” AND (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM OR DMs OR DMing OR DM-ing OR DMed or “direct message”)
	Harm Terms
2	“Youth Terms” AND (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	“Youth Terms” AND (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

4	“Youth Terms” AND (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	“Youth Terms” w/150 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	“Youth Terms” AND (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	“Youth Terms” AND (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	“Youth Terms” AND (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	“Youth Terms” AND (negative w/3 (appearance OR experience OR affect* OR effect*))
10	“Youth Terms” AND (compar* w/5 (appearance OR social OR other* OR negative))
11	“Youth Terms” AND (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” AND (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” AND (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	“Youth Terms” AND (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug OR drugs OR druggy OR druggie OR drugging OR drugged OR OR alcohol* OR Juul)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

15	<p>“Youth terms” w/150 (policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR legislation OR advocacy OR lobby* OR legislator OR legislative OR legislate OR legislates OR legislated OR legislating OR law OR suspend* OR revok* OR fine* OR sanction* OR abandon* OR ban OR banned OR banning OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)</p>
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Department of Health and Human Services

#	Social Media Terms
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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

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11	“Youth Terms” AND (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” AND (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
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14	“Youth Terms” w/150 (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug OR drugs OR druggy OR druggie OR drugging OR drugged OR OR alcohol* OR Juul)
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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

State Budget Office

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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

Executive Office of the Governor

#	Social Media Terms
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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

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Department of Lifelong Education, Advancement, and Potential

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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

	Harm Terms
2	“Youth Terms” AND (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
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MDL 3047 – 2024-12-09 Agency Discovery JLB
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MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

Custodians: Meta proposes that the above search terms be run on agency custodial documents as designated above (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Michigan AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Department of Education	Nicole Kramer*	Survey Coordinator, School Health and Safety Programs
Department of Education	Aimee Alaniz*	Director, Office of Health and Safety
Department of Education	Amy Wassmann*	Safe and Supportive Schools Unit Supervisor
Department of Education	Cathy Lancaster*	Youth Services Coordinator, Library of Michigan
Department of Health and Human Services	Patricia Neitman*	State Bureau Director, Bureau of Children’s Coordinated Health, Policy, and Supports
Department of Health and Human Services	Darrell Harden*	Section Manager, Grants and Project Management in the Behavioral and Physical Health and Aging Services Administration
Department of Health and Human Services	Angela Smith*	Public Health Consultant
Department of Health and Human Services	Laura Blodgett*	Senior Deputy Director, Communications Administration
State Budget Office	David Fosdick*	Director, Office of Health and Human Services

MDL 3047 – 2024-12-09 Agency Discovery JLB
Michigan – Meta Proposal

Agency	Custodian	Title
State Budget Office	Matt Ellsworth*	Senior Fiscal Analyst, Michigan House of Representatives
State Budget Office	Kayla Rosen*	Financial Specialist
Governor's Office	Zoe Ahlstrom*	Interim Policy Director
Governor's Office	Marc Rehmann*	Advisor
Governor's Office	Algeria Wilson*	Deputy Director of Juvenile Justice Reform, MDHHS
Department of Lifelong Education, Advancement, and Potential	Emily Laidlaw*	Deputy Director of Early Education
Department of Lifelong Education, Advancement, and Potential	Erika Bigelow*	Division Director, Child Care Licensing Bureau

Michigan Department of Attorney General

In lieu of search terms, Plaintiff proposes targeted searches—which are already taking place, if not completed—in response to Meta’s discovery demands.

Michigan’s agencies have agreed to complete a reasonable targeted search and produce, by December 19, 2024, non-privileged documents related to the impact of social media on youth and youth mental health. The status of these efforts is as follows:

- The **Michigan Department of Health and Human Services** was issued a Rule 45 subpoena issued in August 2024 and provided responsive documents and information to Meta consistent with this approach on 9/6/24 and 11/17/24.
- The **Michigan Department of Education** was issued a Rule 45 subpoena in August 2024 and provided responsive documents and information to Meta consistent with this approach on September 11, 2024.
- The **Executive Office of the Governor** has agreed to complete a reasonable targeted search and produce, by December 19, 2024, non-privileged documents related to the impact of social media on youth and youth mental health. This effort is ongoing.
- The **Michigan Department of Lifelong Education, Advancement, and Potential** agreed to complete a reasonable targeted search and produce, by December 19, 2024, non-privileged documents related to the impact of social media on youth and youth mental health. It provided responsive documents to Meta consistent with this approach on September 11, 2024, and its search is ongoing.
- The **State Budget Office** was the subject of only Meta’s Second RFP and had no responsive records. Meta subsequently issued a Rule 45 subpoena to this agency on November 27, 2024, and SBO’s response is not yet due.
- Meta has agreed to accept go-get-‘em searches for the **Michigan Department of Labor and Economic Opportunity**.